



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Janis Crum, Treasurer
Building Our Leadership Diversity PAC
611 Pennsylvania Avenue, S.E., #310
Washington, DC 20003

JUN 12 2002

Identification Number: C00365536

Reference: Year End Report (7/1/01-12/31/01), Amended 12 Day Pre-Primary Report (1/1/02-2/20/02), received 4/5/02 and April Quarterly Report (2/21/02-3/31/02)

Dear Ms. Crum:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Each separate segregated fund and non-connected committee utilizing separate federal and non-federal accounts is required to allocate any administrative expenses between the accounts in proportion to the FUNDS EXPENDED METHOD derived from FEC Schedule H1. A Schedule H1 must be filed with the first FEC FORM 3X filed at the beginning of each two-year election cycle. 11 CFR §106.6(c)

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please provide the necessary information regarding